

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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March 23, 2020

**Via Electronic Filing**

The Honorable Senior Judge Frederic Block  
U.S. District Court Eastern District of New York  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re:** *Singh v. Lintech Electric, Inc. et al*  
**Case No.: 1:18-cv-05780-FB-SMGJO**

Dear Honorable Senior Judge Block:

This law firm represents Defendants Lintech Electric, Inc. (the “**Company**”) and Linden Tudor in the above-referenced action.

This law firm also represents Defendants Holly Tudor, Linden Tudor and Tudor Enterprise Family Limited Partnership in the state court actions captioned *Singh v. Holly Tudor et al* (Index No. 720551-2019) (the “**First State Court Action**”) and *Singh v. Tudor Entr. Family Ltd Partnership et al* (Index No.: 526826-2019) (the “**Second State Court Action**”, and together, the “**State Court Actions**”).

Pursuant to Your Honor’s Individual Motion Practice Rules 1(D) and 2(D), this letter respectfully serves to request a global two (2) week extension of the parties’ previously agreed upon briefing schedule for Defendants’ motion to dismiss the State Court Actions. The revised proposed briefing schedule is as follows:

1. Defendant’s Motion to Dismiss to be filed on or before: April 10, 2020;
2. Plaintiff’s Opposition to be filed on or before April 24, 2020;
3. Defendant’s Reply to be filed on or before May 15, 2020

This is the first request of its nature. On March 20, 2020 and March 23, 2020, the undersigned emailed Plaintiff’s counsel to obtain his consent. As of the date of the filing of this letter, Plaintiff’s counsel has not communicated whether he does or does not consent to the instant application.

This request would not affect any other scheduled deadlines.

The basis of the request is that Defendants require additional time to brief the motions to dismiss in light of the ongoing COVID-19 pandemic. Needless to say, the COVID-19 pandemic has complicated previously scheduled deadlines.

We wish Your Honor and the Court the best during these extraordinary times.

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel